

May 20, 2021

Mr. Vincent Osier  
Geographic Standards, Criteria, and Quality Branch  
Geography Division  
U.S. Census Bureau

Re: Urban Areas for the 2020 Census-Proposed Criteria (Docket No. 210212-0021)

Dear Mr. Osier:

The Association of Metropolitan Planning Organizations (AMPO), the American Public Transportation Association (APTA), the Community Transportation Association of America (CTAA), the National Association of Counties (NACo), the National Association of Development Organizations (NADO), the National Association of Regional Councils (NARC), and the National League of Cities (NLC) are writing to jointly request consideration of the following comments in response to the U.S. Census Bureau's Urban Areas for the 2020 Census-Proposed Criteria (Docket No. 210212-0021) that was published in the Federal Register on February 19, 2021, and would substantially impact the operations of local governments, planning organizations, and public transit agencies if you proceed as proposed.

The undersigned organizations represent a broad coalition of local stakeholders including cities, counties, metropolitan planning organizations, regional and rural planning organizations, and public transit agencies from across the country. Our organizations work on behalf of local and regional government entities that carry out the transportation policy and planning requirements resulting from Congressional legislation and Federal regulations as well as the allocation and investment of federal funds. Cities, counties, and townships own and maintain almost 3.1 million miles of America's roads, making up almost 80% of the national road network. Local and regional government entities serve a critical role in working with stakeholder agencies to ensure the safe and efficient movement of people and goods.

The data provided by the decennial census serves as a basis for not only many planning and programming activities, but for significant long-term investment decisions. The undersigned organizations have reviewed the proposed criteria in coordination with local stakeholders nationwide, industry partners, and both the Federal Highway Administration and Census Bureau. We ask for attention to the following concerns for your due consideration before proceeding:

**One-size does not fit all metropolitan areas.**

The proposed change from population as the main criterion to housing unit density when determining the qualification of census blocks as urban does not support the variety of urban development and land use patterns seen throughout the nation. In areas where development is more constrained, this may be a reasonable criterion; in areas where more space is available, development patterns change, and housing unit density decreases despite serving an urban core economically. As such, this shift will not adequately represent the urban areas serving all types of metropolitan areas. Our members also raised concerns about the proposed elimination of census tracts as the basis for designating an urban area, which may cause data and analysis challenges by



dramatically increasing the number of urban cores in a region to an unworkable number or resulting in the elimination of blocks that are highly similar in land use and density to surrounding blocks but that fall just below the designated housing density threshold.

Separately, a shift to housing unit density will affect vacation communities that cater to seasonal activities such as skiing and beach rentals, in some cases propelling them into a traditionally classified urbanized area when the year-round population would not support such a designation. This emphasis on housing unit density can erroneously overstate and understate the actual metropolitan urban area. We also heard from several members that are concerned this misstatement is likely to be even more pronounced by the application of outdated impervious surface data (from 2016), which will have disproportionate impacts on the urban form of faster growing areas.

The proposed changes to hops and jumps are also examples of where regional development patterns are not adequately accounted for. Certain areas of the country have topographical limitations that affect their development, such as seasonal floodplains and steep mountainsides, neither of which are currently included in the list of exemptions. Combined with these topographical limitations, development rarely occurs in a linear fashion, moving from one block to the next. In the absence of an expanded or more flexible list of exemptions, the 2.5-mile jump distance is a reasonable accounting of these development patterns in urban form. Therefore, we recommend maintaining the 2.5-mile jump distance when the commuting to the core urbanized area supports inclusion of outer areas in the urbanized area designation.

In addition to the above comments regarding methodology, the undersigned organizations have significant concerns related to the impacts that these proposed changes could have on the organizational structure and funding of local and regional governments throughout the nation. We are particularly concerned about the metropolitan transportation planning process as defined in 23 U.S. Code § 134. Several of the changes proposed to the urban area definition could result in a number of areas falling below the 50,000 population threshold for a metropolitan planning organization; in other cases, metropolitan planning organizations could lose their transportation management area status by falling below the population threshold of 200,000 individuals. While it is our understanding that the impacted metropolitan planning organizations *could* remain designated as an MPO and/or TMA, the possibility remains that they will lose critical funding, even in urban areas that are experiencing an overall growth in population. We are unable to anticipate the severity of these impacts due to the lack of available data and data limitations. While we understand that the U.S. Census Bureau's primary focus and concern is with the methodology, we strongly urge you to consider the potential consequences of the proposed changes as they could jeopardize the safe and efficient coordination of transportation systems across the country.

**Data is unavailable to assess the proposed changes, preventing the Census Bureau, other federal agencies, regional and local representatives from anticipating the full range of consequences.**

Without the actual 2020 Census data it is an insurmountable task to evaluate the proposed urban area criteria and how these changes will impact our regional and metropolitan members. We are being asked to comment on these changes without a full view of what they will mean. To allow all effected stakeholders an appropriate

opportunity to comment on these changes, either (1) the Census Bureau must provide an analysis for the urban areas using 2020 preliminary data with the proposed changes in methodology or (2) this notice must be reissued once the full 2020 data set has been released and is available for analysis. It is unreasonable to expect any sort of robust assessment or comments from stakeholders given these data limitations.

Overall, the proposed changes seem to be an attempt to narrow the definition of an urban area. This is extremely concerning because it does not account for unique regional and local differences nor does it account for the thousands of programs and affiliations that are disrupted by these changes at a time when U.S. cities are emerging post-pandemic and where staff resources have been strained to focus on the pressing issues ahead.

Out of the hundreds of metropolitan areas in the nation, no two are the same. However, they are united in that changes to this baseline definition create an unknown level of ripple effects where the consequences without consideration of the impacts are inexcusable.

For the reasons stated in this letter, our organizations strongly urge the U.S. Census Bureau to:

- 1. Delay implementing these proposed changes, at least until such time as a more thorough and accurate assessment of the proposed changes can be conducted based on 2020 Census data.**
- 2. Consider implementing a feedback mechanism, similar to the Participant Statistical Areas Program (PSAP) process, that would allow metropolitan and regional planning organizations the opportunity to provide feedback, based on verifiable local data, that would allow for the reconsideration of the designation of certain blocks if they could be proven to be of a different nature than Census analysis provides.**

The undersigned organizations would appreciate the opportunity to meet with you to discuss these comments on the Urban Areas for the 2020 Census-Proposed Criteria at your earliest convenience. If you have any questions or comments regarding this letter, please feel free to contact Bill Keyrouze at [bkeyrouze@ampo.org](mailto:bkeyrouze@ampo.org).

Respectfully,

Association of Metropolitan Planning Organizations  
American Public Transportation Association  
Community Transportation Association of America  
National Association of Counties  
National Association of Development Organizations  
National Association of Regional Councils  
National League of Cities

Cc: The Honorable Gina M. Raimondo, Secretary, U.S. Department of Commerce